

# EXHIBIT 11

**From:** [Jeff Nardinelli](#)  
**To:** [Jaideep Venkatesan](#); [Stacylyn Doore](#); [Ryan Landes](#); [Ryan Gorman](#); [QE-Swan](#)  
**Cc:** [Adam Trigg](#); [Kanny, Matthew P](#); [Fondo, Grant P](#); [Russo, Amanda](#); [Thompson, Aaron](#); [Emma Fernandez](#)  
**Subject:** RE: Electric Solidus, Inc v. Proton Management Ltd, et al. - Case No. 2:24-cv-8280-WLH-E  
**Date:** Tuesday, April 22, 2025 2:22:01 PM  
**Attachments:** [image001.png](#)

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Counsel,

For the avoidance of doubt, Swan disagrees with how Defendants' April 15 letter characterizes Swan's trade secret identification. Swan's trade secret identification stands as filed at Dkt. 111-1.

Thanks,  
Jeff

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**From:** Jaideep Venkatesan <jvenkatesan@be-law.com>  
**Sent:** Tuesday, April 15, 2025 5:36 PM  
**To:** Stacylyn Doore <stacylyndoore@quinnemanuel.com>; Ryan Landes <ryanlandes@quinnemanuel.com>; Ryan Gorman <ryangorman@quinnemanuel.com>; QE-Swan <qe-swan@quinnemanuel.com>  
**Cc:** Adam Trigg <atrigg@be-law.com>; Kanny, Matthew P <MKanny@goodwinlaw.com>; Fondo, Grant P <GFondo@goodwinlaw.com>; Russo, Amanda <ARusso@goodwinlaw.com>; Thompson, Aaron <ATHompson@goodwinlaw.com>; Emma Fernandez <emtofelogo@be-law.com>  
**Subject:** Electric Solidus, Inc v. Proton Management Ltd, et al. - Case No. 2:24-cv-8280-WLH-E

[EXTERNAL EMAIL from [jvenkatesan@be-law.com](mailto:jvenkatesan@be-law.com)]

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Counsel,

Please see attached.

Regards,

Jay

Jaideep Venkatesan | Bergeson   
Partner

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Pronouns: he/him/his